

Matthew C. Addison (NSBN 4201)
McDONALD CARANO LLP
100 West Liberty Street, Tenth Floor
Reno, Nevada 89501
Telephone: (775) 788-2000
maddison@mcdonaldcarano.com

*Attorneys for Central Environmental, Inc. and
Liberty Mutual Insurance Company*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA FOR THE
USE AND BENEFIT OF Q.M.E. GUNITE,
INC., a California corporation,

Plaintiff,

v.

CENTRAL ENVIRONMENTAL, INC., an
Alaska corporation; and LIBERTY MUTUAL
INSURANCE COMPANY, a Massachusetts
corporation,

Defendants.

Case No. 3:24-cv-00230-CSD

**STIPULATION TO DISMISS WITH
PREJUDICE AND ORDER**

Plaintiff United States of America For The Use And Benefit of Q.M.E. Gunite, Inc., a California corporation (“Plaintiff”), and Defendants Central Environmental, Inc., an Alaska corporation, and Liberty Mutual Insurance Company, a Massachusetts corporation (“Defendants”), through their respective undersigned counsel, hereby represent they have entered into a confidential settlement of the above-captioned matter, and stipulate and agree as follows:

1. All of the claims and causes of action asserted, or that could have been asserted, by Plaintiff against Defendants, including its related persons, entities, companies (as managers, owners, shareholders, and/or members) and successors-in-interest, in this litigation may be, and hereby are, dismissed with prejudice, with each party to bear its own attorneys’ fees and costs incurred in the litigation and settlement of this matter.

2. All counterclaims and causes of action asserted, or that could have been asserted, by Defendants against Plaintiff, including its related persons, entities, companies (as managers, owners, shareholders, and/or members), and successors-in-interest, in this litigation may be, and hereby are, dismissed with prejudice, with each party to bear its own attorneys' fees and costs incurred in the litigation and settlement of this matter.

Dated this 27th day of January, 2025

Dated this 27th day of January, 2025

LANAK & HANNA, P.C.

McDONALD CARANO LLP

By: /s/ David R. Johnson

By: /s/ Matthew C. Addison

David R. Johnson (NSBN 006696)

Matthew C. Addison (NSBN 4201)

8375 W. Flamingo Rd. #102

100 West Liberty Street, Tenth Floor

Las Vegas, NV 89147

Reno, Nevada 89501

Telephone: (702) 727-3565

Telephone: (775) 788-2000

drjohnson@lannak-hanna.com

maddison@mcdonalddcarano.com

*Attorneys for United States of America For
The Use And Benefit if Q.M.E. Gunitite Inc.*

*Attorneys for Central Environmental, Inc. and
Liberty Mutual Insurance Company*

ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: January 28, 2025